

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) CLAYTON M. WARD,
[DOB: 10/18/1985]

(2) JAI LYNN BENNION,
[DOB: 04/28/1985]

(3) JUAN G. TAYLOR,
[DOB: 06/24/1969]

(4) JAMES MARTEL, JR.,
[DOB: 01/24/1981]

(5) DEREK A. HENDERSON,
[DOB: 10/22/1961]

(6) BRITTANY N. MIKEL,
[DOB: 05/07/1993]

(7) PATIENCE L. WESTMORELAND,
[DOB: 08/08/1994]

(8) TRAVIS J. PIGG,
[DOB: 10/14/1979]

and

(9) CHRISTOPHER R. STEPHENS,
[DOB: 04/05/1973]

Defendants.

Case No. _____

COUNT ONE: ALL DEFENDANTS
(Conspiracy to Distribute Methamphetamine)
21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846
NLT: 10 Years and NMT Life Imprisonment
NMT: \$10,000,000 Fine
NLT: 5 Years Supervised Release
Class A Felony

COUNTS TWO, THREE, and FOUR:
DEFENDANT MIKEL
(Distribution of Methamphetamine)
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
NLT: 5 Years and NMT 40 Years Imprisonment
NMT: \$5,000,000 Fine
NLT: 4 Years Supervised Release
Class B Felony

FORFEITURE ALLEGATIONS:
ALL DEFENDANTS
21 U.S.C. § 853
Notice of Criminal Forfeiture

\$100 Mandatory Special Assessment Each
Count

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	CLAYTON M. WARD	1
2	JAI LYNN BENNION	1
3	JUAN G. TAYLOR	1
4	JAMES MARTEL, JR.	1
5	DEREK A. HENDERSON	1
6	BRITTANY N. MIKEL	1, 2, 3, 4
7	PATIENCE A. WESTMORELAND	1
8	TRAVIS J. PIGG	1
9	CHRISTOPHER R. STEVENS	1

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Distribute Methamphetamine)

Between on or about February 1, 2017 and August 21, 2019, said dates being approximate, in the Western District of Missouri and elsewhere, CLAYTON M. WARD, JAIL LYNN BENNION, JUAN G. TAYLOR, JAMES MARTEL, JR. DEREK A. HENDERSON, BRITTANY N. MIKEL, PATEINCE L. WESTMORELAND, TRAVIS J. PIGG, CHRISTIPHER R. STEVENS, defendants, and co-conspirators not indicted herein, MICHAEL B. PEDRINO, KERVIN GONZALEZ-BERNAL, MANUEL PINITU-ROSA, and ALEJANDO DIAZ-SANCHEZ, did knowingly and intentionally combine, conspire, confederate and agree with each other and others both known and unknown to the grand jury, to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in an amount of 500 grams or more, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

(Distribution of Methamphetamine)

On or about July 23, 2019, in the Western District of Missouri, the defendant, BRITTANY N. MIKEL, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

(Distribution of Methamphetamine)

On or about July 29, 2019, in the Western District of Missouri, the defendant, BRITTANY N. MIKEL, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOUR

(Distribution of Methamphetamine)

On or about August 21, 2019, in the Western District of Missouri, the defendant, BRITTANY N. MIKEL, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

ALLEGATION OF FORFEITURE

1. The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Each defendant shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation of Forfeiture and all property used, or intended to be

used, in any manner or part, to commit, and to facilitate the commission of the violation alleged in
Count One of this Indictment

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty.

The United States of America shall be entitled to forfeiture of substitute property
pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

Dated: 6/22/2021

/s/ Kathleen Shaw
FOREPERSON OF THE GRAND JURY

/s/ Joseph M. Marquez
Joseph M. Marquez #40634
Assistant United States Attorney
Western District of Missouri